

MEMO ENDORSED



U.S. Department of Justice

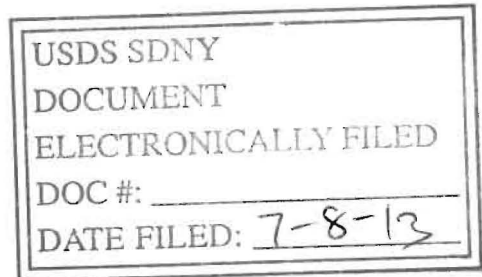
United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

July 8, 2013

Via Email

The Honorable Richard J. Sullivan
United States District Court
Southern District of New York
500 Pearl Street, Room 640
New York, New York 10007



Re: United States v. Michael Steinberg, S4 12 Cr. 121 (RJS)

Dear Judge Sullivan:

The Government provided its Initial Bill of Particulars to the defendant in underacted form on June 7, 2013. Defense counsel has advised the Government that it intends to file a copy of the Government's Initial Bill of Particulars in connection with its motions due today. At the Government's request, the defendant will be filing a redacted version of the Government's Initial Bill of Particulars. The Government has redacted the names of uncharged third parties who have not previously been publicly identified by the Government, either at the trial in *U.S. v. Todd Newman, et al.*, 12 Cr. 121 (RJS), or otherwise. The Government respectfully submits that its request to redact these names falls within the scope of the Court's previous order permitting such redactions. *See Order, U.S. v. Todd Newman, et al.*, 12 Cr. 121 (RJS) (May 16, 2012). Should the Court wish to receive further briefing on the matter, the Government would be happy to provide it.

For the reason set forth in the Court's Order dated May 16, 2012 -- namely, that uncharged third parties' privacy and reputational interests outweigh the public interest in viewing the unredacted bill of particulars (Doc. No. 58) -- the government's request as to its Initial Bill of Particulars is HEREBY GRANTED.

Respectfully submitted,

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cc: Barry Berke, Esq. and Steven Sparling, Esq. (Counsel for Michael Steinberg)

SO ORDERED
Dated:
RICHARD J. SULLIVAN
U.S.D.J.

7/8/13